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November 4, 2022

Via ECF:

The Honorable Sanket J. Bulsara, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Allen v. Quality Facility Solutions Corp et al*
Case No. 22-cv-00967-RPK-SJB

Dear Judge Bulsara:

We are counsel to Plaintiff in the above-referenced matter. Plaintiff writes, jointly with Defendants, pursuant to the Court's Order of October 19, 2022, to update the Court on the status of parties' mediation. While parties' mediation was delayed due to scheduling conflicts, parties' mediation was held and ended unsuccessfully on October 27, 2022.

Parties have now entered Phase 2 Discovery as contemplated in parties' current Scheduling Order. Additionally, as the Phase 1 mediation took parties longer than contemplated under the Order, parties request they be permitted to enter a potential Protective Order regarding discovery in this matter on or before December 1, 2022.

As a final matter, the Court has held in abeyance Defendants Quality Facility Solutions Corp and Defendant Esther Falkowitz Motion to Dismiss pending completion of parties' contemplated mediation. Now, that the mediation has ended unsuccessfully, parties request that this motion be moved back on to the Court's schedule.

We thank the Court for its consideration.

Respectfully submitted,

/s/ C.K. Lee
C.K. Lee, Esq.

cc: all parties via ECF